

Department of the Treasury  
Information Collection Request – Supporting Statement

Emergency Rental Assistance Program  
OMB No. 1505-0270

**Part A. Justification**

1. Circumstances necessitating the collection of information

*Justification for Emergency Processing:*

On March 11, 2021, the President signed the American Rescue Plan Act of 2021 (the “Act”), Pub. L. No. 117-2. Title III, Subtitle B, Section 3201 of the Act authorized the Emergency Assistance (ERA 2) program and provides \$21.55 billion for the U.S. Department of the Treasury (Treasury) to make payments to States (defined to include the District of Columbia), U.S. Territories (Puerto Rico, U.S. Virgin Islands, Guam, Northern Mariana Islands, and American Samoa), and certain local governments with more than 200,000 residents (collectively the “eligible grantees”) to provide financial assistance and housing stability services to eligible households, and cover the costs for other affordable rental housing and eviction prevention activities for eligible households.

Due to the need to expeditiously have ERA grantees prepare and submit brief (two-question) monthly reports in order for Treasury to meet its public reporting obligation under Section 501(g), Treasury requests emergency processing for the ERA2 monthly reports and the monthly reporting guidance for ERA2 grantees.

**Acceptance of Award Terms Form**

An eligible grantee that elects to receive payment under the Emergency Rental Assistance program must complete and sign a form that will indicate its agreement to the award terms, including, most importantly the requirement set forth in section 3201(e) for Treasury to reallocate funds not yet paid beginning on March 31, 2022. Treasury does not have rulemaking authority with respect to this program, so it must obtain the agreement of eligible grantees to require them to comply with these provisions.

**Recipient Payment Information Form**

In order to ensure proper payment by Treasury, each eligible grantee must supply basic identifying and bank routing information. This information should be readily available to officials completing the form.

**Assurances of Compliance with Title VI of the Civil Rights Act of 1964**

As a condition of receipt of federal financial assistance from Treasury, eligible grantees under the ERA 2 program are required to provide assurances pursuant to 31 C.F.R. § 22.5 that they will

comply with the requirements of Title VI of the Civil Rights Act of 1964 and Treasury's Title VI implementing regulations.

### **ERA Monthly Report and Reporting Guidance**

Treasury developed brief (two-question) ERA2 monthly reports and the accompanying reporting guidance to enable ERA2 grantees submit summary information on their utilization of ERA award funds monthly. This reporting will facilitate Treasury's obligations to effectively monitor the ERA2 grantees' compliance with the requirements of the ERA2 award. Reports will be collected for a total of three months, covering June, July & August 2021.

#### 2. Use of the data

The information reported will allow Treasury to ensure proper payments to the eligible grantees.

#### 3. Use of information technology

Treasury will manage the submission process with the use of existing and widely available technology such as a web portal and e-mail.

#### 4. Efforts to identify duplication

The information collections are under new statutory mandates. The information is not known to overlap with any other data collected under any other information collections at Treasury. Furthermore, the information collection is tailored to leverage data that already exists and require only additional data that is necessary.

#### 5. Impact on small entities

This collection of information will minimally affect small entities. However, Treasury will attempt to minimize burden on small entities to the greatest extent practicable.

#### 6. Consequences of less frequent collection and obstacles to burden reduction

Treasury will collect only the information required to make any payments to the eligible grantees. The eligible grantees will submit a limited amount of information that should be readily available to the entity in the ordinary course of business. If the eligible grantees are unable to provide their completed recipient payment information form and acceptance of award terms form, Treasury would not be able to make payment to those eligible grantees.

If ERA2 grantees fail to complete and submit the brief monthly reports to Treasury, Treasury will be less able to meet its requirement to monitor ERA2 grantees' compliance with the ERA2 program requirements.

#### 7. Circumstances requiring special information collection

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. Solicitation of comments on information collection and justification for expedited processing pursuant to 5 C.F.R. § 1320.13

This information collection request is being submitted under emergency clearance procedures in order to comply with statutory deadlines and expedite payments to eligible grantees. As such, advance public notice and comment is not possible.

9. Provision of payments to respondents

No payments or gifts are provided to respondents.

10. Assurance of confidentiality

Information collected will be kept confidential to the extent appropriate and consistent with the Freedom of Information Act and other applicable laws.

11. Justification of sensitive questions

No sensitive questions will be asked of eligible grantees.

12. Estimate of the hour burden of information collection.

The Recipient Payment Information form, Acceptance of Award Terms form, Title VI Assurances, and Monthly Reporting burden estimates are as follows:

<b>Reporting</b>	<b># of Respondents</b>	<b># Responses Per Respondent*</b>	<b>Total Responses</b>	<b>Hours per response</b>	<b>Total Burden in Hours</b>	<b>Cost to Respondent (\$47.50 per hour**)</b>
Acceptance of Award Terms Form	482	1	482	0.25 (15 minutes)	121	\$5,748
Recipient Payment Information Form	482	1	482	0.25 (15 minutes)	121	\$5,748
Title VI Assurances	482	1	482	.50 (30 minutes)	241	\$11,448
ERA2 Monthly Reporting	376	3	1,128	1	1,128	\$53,580

<b>Total</b>	<b>1,823</b>		<b>2,574</b>		<b>1,611</b>	<b>\$76,523</b>
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\* There were 482 respondents for the combined ERA 1 & 2 programs, but only 376 respondents for the ERA 2 program.

\*\* Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Outlook Handbook, Accountants and Auditors, on the Internet at <https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm> (visited December 30, 2020). In 2019, the median pay for accounts and auditors was \$34.40/hour. To account for the fully-loaded employer cost of employee compensation, the median pay is increased by 38%, resulting in a fully-loaded wage rate of \$47.50. According to BLS’s Employer Cost for Employee Compensation from September 2020 (released on December 17, 2020: <https://www.bls.gov/news.release/pdf/ecec.pdf>), employers provided 38% of total employee compensation in the form of non-wage compensation (i.e., benefits such as paid leave, health insurance, etc.) for state and local government workers.

13. Estimated total annual cost burden to respondents

There are no annualized capital/startup costs for the eligible recipients to provide the information in the form or certification.

14. Estimated cost to the federal government.

As this is a new program being set up in response to emergency circumstances, Federal costs have not been estimated yet.

15. Reasons for change in burden

There is an increase in burden of 1,128 hours due to the addition of monthly compliance reporting.

16. Plans for tabulation, statistical analysis and publication

Treasury plans to publish the data for disbursements.

17. Display of the expiration date for OMB approval

Treasury plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to submission requirements

There are no exceptions to the submission requirements.

Part B. Describe the use of statistical methods such as sampling or imputation.

This collection does not employ statistical methods.